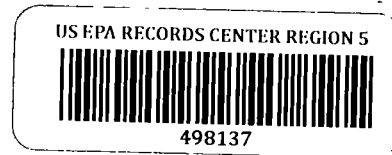




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

September 15, 1992

CS-3T

Linda Bullen  
McDermott, Will & Emery  
227 W. Monroe Street  
Chicago, Illinois 60606-5096

Michael Steinberg  
Morgan, Lewis & Bockius  
8th Floor  
1800 M Street, N.W.  
Washington, D.C. 20036

Re: United States v. The Selmer Co., et al. -- Work Plan

Dear Linda and Mike:

After having waited nine months for a revised work plan to address the extent of contamination study at the Selmer Site, U.S. EPA is extremely frustrated by the product submitted on behalf of your clients. WW Engineering & Science obviously was not given U.S. EPA's comments, provided to you last December and attached hereto, on the work plan originally submitted. The major defects in the plan delivered to the government on August 31, 1992 have to do with the total disregard of the investigation of possible groundwater contamination, the repeated effort to avoid any soil borings unless "elevated" levels of VOCs are found through soil gas analysis, and the lack of a project schedule. The work plan must be modified to address these concerns. Below are specific comments.

o As you know, depositions of former plant employees established that many thousands of gallons of TCE still bottoms, sludge from degreasers, and pure TCE were disposed of behind the plant and to a lesser extent beneath the plant. The waste disposed of behind the plant was seen running down the slope to the swampy area which often contained standing water. It is thus highly likely that hazardous substances reached the ground water. Given this history, the investigation must determine the identity, amounts and location of any hazardous substances, pollutants or contaminants in the groundwater at the Selmer Site. Add an additional phase, or incorporate a plan into Phase I or II, for groundwater investigation. This plan should be as detailed as

that provided for the soil sampling. Address comment #4 from the list of comments that were provided to you last December.

o page 1: In the introduction, the stated purpose is limited to an investigation at the "facility". Consistent with our agreement as reflected in the latest draft Consent Decree, the investigation is to include not only the facility, but "contiguous property where hazardous substances have come to be located as the result of hazardous substance disposal at the Selmer facility". In the introduction and throughout the work plan, wherever work is being described, "Site", as defined in the Consent Decree, should replace "facility".

o page 3, last para., 2d sentence: The earliest year in which we know that distillation units were used is 1967. [See Defendants' responses to interrogatories.]

o page 3, last para., last sentence: This sentence should be deleted or rewritten to be consistent with what we know about the still bottoms -- that for many years, they were disposed of onto the ground outside of the facility, rather than transported off-site.

o page 6: The Purpose and Scope of Work shall be modified to include the following objectives:

- to delineate the impact of VOCs to soil at the Site;
- to evaluate the extent of VOC contamination in the groundwater at the Site;
- to determine the rate and direction of groundwater flow at the Site;
- if VOCs greater than MCLs or non-zero MCLGs are detected, to evaluate alternatives for appropriate remedial action.

o page 6, last para.: Implementation of Phase II shall not be dependent upon finding "elevated levels" of VOCs in the soil gas. At a minimum, soil borings will be required in the areas of known disposal of hazardous substances and in those areas identified by the PETREX method as potential areas of contamination. (See comment #2 on list of comments provided to you last December.) Even if the PETREX method fails to identify potential areas of contamination, several confirmatory borings will be required in areas of known disposal, based upon deposition testimony and maps of the facility.

o Appendix A, 5.4: Since the soil gas analysis provides the basis for some additional work, this data must be presented to U.S. EPA.

o Appendix B, page 2: WWES's Health & Safety Officer must be identified.

o Provide a project schedule.

Please contact me or Frank, at the earliest date possible, if you have any questions concerning the Agency's comments. In any event, we are looking forward to receiving a revised work plan on or about October 1, 1992.

Sincerely,

  
Elizabeth O. Murphy  
Assistant Regional Counsel

cc: K. Theisen, OSC  
F. Bentkover, DOJ

## SELMER WORK PLAN COMMENTS

### 1. Sampling Activities

- o Identify the sampling procedures and equipment that will be used for soil gas, soils and groundwater samples.
- o Identify the QA-QC procedures you will follow, including: the number of duplicates and blanks to be collected; the type and quantity of preservatives you will use; chain-of-custody procedures; laboratory methods; name of laboratories you intend to use; shipping procedures, etc.
- o Specify decontamination procedures for sampling equipment.
- o Include the latitude/longitude coordinates of the sample sites and a site map of sampling locations.
- o Define the frequency and duration of sampling for each of the matrices being sampled.
- o Discuss the method of head-space analysis if it is going to be used as a screening tool.

### 2. Soil Gas Investigation

- o In areas where it is known that disposal took place, 100-foot spacing is inadequate and 25 foot spacing will be required. On the map indicating sample locations, delineate where 100 foot grid will be used versus the 25 foot interval.
- o Identify the parameters that will be analyzed. U.S. EPA will require, at a minimum, a full VOC scan.
- o SGA will not replace the need to take soil samples by using split spoon and chemical analysis in areas of suspected or known disposal of hazardous substances or in those areas identified by SGA as potential areas of contamination.

### 3. Develop a specific Health and Safety Plan.

- o Identify the H&S officer and list his/her responsibilities.
- o Develop a risk analysis for each field task.
- o Discuss the use of relevant safety equipment and the various levels of protection.

### 4. Installation of Monitor Wells

- o Address the issue of residual TCE, still bottoms, and sludges -- at what levels and stratas would TCE from these sources likely be found: Propose a sampling plan to include any such likely locations.
- o Will split spoon samples be taken, the analytical results of which will be used as a guide to set the screened interval? If not, identify the method by which the screened interval will be determined.
- o Provide the technical specifications themselves, rather than stating the specifications will be provided. For example, what types of wells (single or nested), type of casing (PVC/stainless/teflon/etc.), how deep, etc.
- o Identify the drilling method to be used.
- o U.S. EPA will require selective "splits".

5. General

- o Develop an Emergency Response Contingency Plan
- o Provide a Project Schedule